

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Criminal No. 05-177 (ESH)

v.

TEDDARRIAN CREWS,

FILED

Defendant.

JUN 21 2005

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

STATEMENT OF OFFENSE

Pursuant to Fed. R. Crim. P. 11, defendant, Teddarrian Crews, and the United States agree and stipulate as follows:

Between May 2004 and February 2005, defendant was employed by the Equal Employment Opportunity Commission (“EEOC”) as an Audiovisual Specialist. Defendant was assigned to the EEOC’s Office of Congressional and Legislative Affairs at the EEOC headquarters building at 1801 L Street NW in the District of Columbia. In his employment capacity, defendant had access to electronic and computer equipment purchased by the EEOC in support of its operations.

Between May 2004 and February 2005, defendant stole in excess of ninety electronic and computer items valued at approximately \$92,233.45 from the EEOC headquarters building. These items included, but were not limited to, Dell laptop computers, Cisco Catalyst 2950C and CISCO Catalyst WS 3550-SMI network switches, D-Link video phones, Dell flat panel monitors, SHURE UC wireless microphone systems and INFOCUS LP70 projectors. Defendant sold nearly all of the stolen items through the Internet auction service e-Bay, using the seller name of “Cripwalker” and an e-mail address of swerc@msn.com.

On October 23, 2004, an investigator accessed the e-Bay website and observed that an individual later identified as “T.P.” in San Jose, California, was selling a Cisco 2950C network

switch. The investigator purchased this switch from T.P., who in turn sent it to him through the U.S. mail. Upon inspecting the switch, the investigator determined that it had the same serial number as a brand new Cisco 2950C network switch that had been stolen from the EEOC headquarters building in September 2004.

During an interview, T.P. told investigators that on September 22, 2004, he purchased a Cisco Catalyst 2950C network switch from a person using the e-Bay seller identification of "Cripwalker" and e-mail address of swerc@msn.com. T.P. paid for this item using e-Bay's payment system for online transactions which is called "PayPal." T.P. provided investigators with a record from PayPal dated September 22, 2004, documenting the completion of T.P.'s payment to "Cripwalker" who was further identified in the record as "Teddarian Crews" with an e-mail address of "swerc@msn.com." T.P. told investigators that he had purchased additional Cisco Catalyst 2950 network switches from "Cripwalker" on September 29, 2004; September 30, 2004 (four switches); and October 5, 2004.

On December 11, 2004, an investigator purchased a SHURE UC wireless microphone system on e-Bay from a seller identified as "Cripwalker" using an e-mail address of swerc@msn.com. After the investigator paid for the item using PayPal, he received a receipt from PayPal indicating that his payment had been made to "Teddarian Crews." A few days after the sale, "Cripwalker" sent the wireless microphone system to the investigator in a United States Postal Service package. The package had defendant's initials and known home address (3849 Eisenhower Avenue Alexandria, VA 22304) listed in the return address section. Inside the package were three pieces of junk mail addressed to "Teddarian Crews" of 3849 Eisenhower Avenue Alexandria, VA 22304. The wireless microphone system that the agent received from "Cripwalker" matched the description and serial number of a SHURE wireless microphone

system taken without permission from the EEOC headquarters building.

On December 20, 2004, "Cripwalker" listed another SHURE wireless microphone system for sale on e-Bay. An investigator purchased the microphone system from Cripwalker on December 23, 2004. On December 29, 2004 the SHURE wireless microphone was delivered to the investigator via a United Parcel Service package that had a return address of 3849 Eisenhower Avenue, Alexandria VA 22304. The investigator determined that the microphone matched the description and serial number of a SHURE wireless microphone system that was discovered missing from the EEOC headquarters building on December 21, 2004.

Further investigation revealed that defendant, using the name "Cripwalker," sold or attempted to sell numerous other items on e-Bay that were later determined to have been stolen from the EEOC headquarters building between May 2004 and February 2005. The fair market value of these items totaled \$92,233.45 and included:

- 4 Dell Latitude D600 Laptop Computers, each valued at \$1,233.75
- 1 Ikegami HL-V75 W digital camera recorder valued at \$27,839.00
- 1 Viewsonic 17 inch LCD Monitor valued at \$230.00
- 1 Nikon Coolpix 5000 Camera valued at \$200.00
- 1 Sennheiser Wireless Microphone valued at \$800.00
- 1 Sony Beta SP Video Editor valued at \$5,000.00
- 3 Cisco 3550-48-SMI Catalyst Network Switches, each valued at \$3,000.00
- 9 D-Link Video Phones, each valued at \$198.88
- 13 Cisco 2950C-24 Catalyst Network Switches, each valued at \$1,326.14
- 1 AVID MOJO Digital Accelerator valued at \$1,200.00
- 2 Polycom Visual Concert FX each valued at \$1,499.50

- 2 SHURE Wireless Microphone Systems, each valued at \$1,055.37
- 41 Dell E171FPB Flat Panel Color 17" Monitors, with a total value of \$14,000.00
- 3 INFOCUS LP70 Projectors each valued at \$1,400.00
- 3 Polycom Voice Stations each valued at \$229.99

Total: \$92,233.45

Several of the e-Bay members who had purchased these items told investigators that they had made the purchase from an e-Bay seller identified as "Cripwalker" with an e-mail address of swerc@msn.com. These e-Bay members received the items they purchased from "Cripwalker" in packages displaying the return address of 3849 Eisenhower Avenue, Alexandria, VA, 22304, from either "Ted Crews," "Lamar Crews" or "Teddarian Crews." These members also provided investigators with PayPal records documenting each purchase made from "Cripwalker."

Records obtained from e-Bay document that the seller identified as "Cripwalker" became an e-Bay subscriber on October 30, 2002. From October 30, 2002 through October 5, 2004, "Cripwalker" maintained the following contact information on file at e-Bay: "Teddarian Crews" of 3849 Eisenhower Avenue, Alexandria, VA, 22304. "Cripwalker" also listed an e-mail address of swerc@msn.com. The Internet Protocol ("IP") address associated with Cripwalker's account is an IP address assigned to the EEOC. E-Bay records further indicate that on October 5, 2004, "Cripwalker" changed his contact information to: "Lamar Cruz" of 3849 Eisenhower Avenue, Alexandria, VA 22304.

PayPal records for swerc@msn.com list the user as "Teddarian Crews" of "3849 Eisenhower Avenue, Alexandria, VA 22304." Cripwalker's PayPal account provides a credit card and a bank account in the name of "Teddarian Crews." An analysis of defendant's PayPal account reveals that between July 20, 2004 and December 31, 2004, there were a total of

\$43,250.39 electronic deposits. In addition, there were numerous electronic deposits by PayPal into defendant's Wachovia Bank personal checking account between July 2004 and August 2004.

A forensic examination of defendant's EEOC desktop computer revealed photographs of items that were stolen from the EEOC and later sold on e-Bay by "Cripwalker." The forensic examination also revealed transaction information, e-mail communications, and PayPal records directly tying defendant to the sale of the stolen EEOC items on e-Bay.

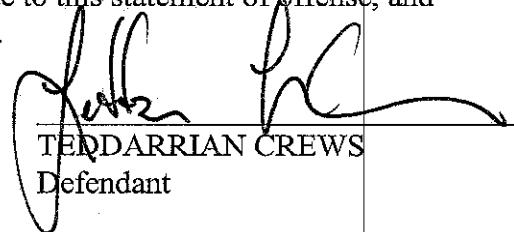
The fair market value of the items defendant stole from the EEOC is in excess of \$92,233.00. Defendant did not have permission from the EEOC to remove these items from the EEOC headquarters building or to sell them on e-Bay. The evidence shows that defendant, as part of a scheme and artifice to defraud and to obtain money by false and fraudulent pretenses, sold items that he had stolen from the EEOC on e-Bay, representing that he was the lawful owner of these items.

On or about September 22, 2004, in a continuing course of conduct, in the District of Columbia and elsewhere, defendant Teddarrian Crews, for the purpose of executing the above-described scheme and artifice to defraud and deprive, transmitted and caused to be transmitted by means of wire communication in interstate commerce, e-mail communications to T.P., a resident of San Jose, California, in order to induce T.P. to purchase a Cisco Catalyst 2950C network switch that defendant represented was his property when in fact defendant had stolen the Cisco Catalyst 2950 network switch from the EEOC.

DEFENDANT'S ACCEPTANCE

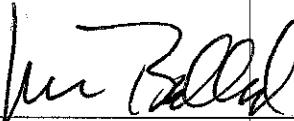
I have read every word of this five-page statement of offense. Pursuant to Fed. R. Cr. P. 11, after consulting with my attorney, I agree and stipulate to this statement of offense, and declare under penalty of perjury that it is true and correct.

Date: 6/21/05


TEDDARIAN CREWS
Defendant

I have read each of the five pages constituting this statement of offense and reviewed and discussed them with my client. I concur with his decision to stipulate to this statement of offense.

Date: 6/21/05


NICHOLAS BALLAND
Attorney for the defendant